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REMARKS

This paper is intended as a full and complete response to the Office Action dated

October 12, 2006, having a shortened statutory period for response set to expire on January 12,

2007.

Claims 1, 15, 18, 20 and 25 are currently amended in the Application.

Claims 21 is currently cancelled.

Claims 29-42 are currently cancelled as non-elected claims.

Claims 1-20, 22-28 and 43-54 are pending in the Application.

Allowable Subject Matter - Claim Amendments

Applicant thanks the Examiner for his time and patience in searching the prior art and

determining that Claims 43-54 are allowable as filed and Claims 15, 18, 20, and 21 are allowable

if rewritten in independent form to include the limitations of the base claim and intervening

claims (if any).

Applicant has amended Claim 1 to include the limitations of Claim 21.

Applicant has amended Claim 15 to independent form to include the limitations of the

base claim (Claim 1) and the intervening claims (Claims 11, 12, and 14).

Applicant has amended Claim 18 to independent form to include the limitations of the

base claim (Claim 1) and the intervening claim (Claim 17).

Applicant has amended Claim 20 to independent form to include the limitations of the

base claim (Claim 1) and the intervening claim (Claim 19).

Applicant has amended Claim 25 to independent form to include the limitations of the

base claim (Claim 1).

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If any fees are due with the noted amendments, the Director is hereby authorized to

charge any fees associated with this filing to Deposit Account Number 11-0400 in the name of

Kellogg Brown & Root LLC.

Election/Restrictions

The Office Action has restricted the current application to one of the following groups:

I. Claims 1-28, and 43-54, drawn to variable riser tensioner; and

II. Claims 29-42, drawn to the method of installing risers.

Applicant hereby elects Claims 1-28 and 43-54 (invention I) with traverse. Applicant

hereby conditionally withdraws Claims 29-42 from consideration in this application pursuant to

the Examiner's restriction request. Applicant reserves the right to re-file withdrawn claims in

another application. Applicant reserves the right to rejoin the withdrawn method claims that

includes all of the limitations of the method claims.

Information Disclosure Statement

With this Response, Applicant has included a replacement Information Disclosure

Statement for reconsideration (see attached document).

Drawings

The Office Action alleges that "the vertically drilled wells and are free of slant must be

shown or the feature(s) canceled from the claim(s)." Applicant believes that Figure 34 depicts

the claimed features. Paragraphs [0075] and [0076] compare the traditional dry tree well

management system with the improved well management system in accordance with this present

invention, including the above mentioned features.

Response to Office Action dated 10-12-06

Serial Number: 10/710,780

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Claim Rejections -- 35 USC 102

The Office Action rejected Claims 1, 7-14, 16-17, 19, 22-24, and 26-28 under 35 USC 102(b) as being anticipated by *Cunningham* US Patent Number 6,062,769. Claims 1, 7-14, 16-17, 19, 22-24, and 26-28 are dependent upon amended Claim 1, which is allowable as amended. Applicant believes that Claims 1, 7-14, 16-17, 19, 22-24, and 26-28 are, therefore, allowable. Reconsideration of these claims is respectfully requested.

Claim Rejections -- 35 USC 103

The Office Action rejected Claims 2-6 under 35 USC 103(a) as being unpatentable over Cunningham US Patent Number 6,062,769 alone. Claims 2-6 are dependent upon amended Claim 1, which is allowable as amended. Applicant believes that Claims 2-6 are, therefore, allowable. Reconsideration of these claims is respectfully requested.

Applicant thanks the Examiner for his time on the matter.

Respectfully submitted,

Date: 12/27/06

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Enclosure - Replacement Information Disclosure Statement